

Exhibit I

CLYDE&CO

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January 18, 2019

VIA E-MAIL ONLY

Gregory L. Mast, Esquire

Fields Howell LLP

E-mail: gmast@fieldshowell.com

RE: Action: *Edward Yearta v. Amusements of America, Inc., et al.*
Claim No: JY17J0311278

Dear Mr. Mast:

Our firm is coverage counsel for ACE American Insurance Company (“Chubb”). As you might have expected, Chubb does not accept your demand to settle on behalf of Delta Fair, Inc. (“Delta Fair”), Amusements of America, Inc. (“AOA”), and Certain Underwriters at Lloyd’s (“Lloyds”).

Chubb is willing to recognize a duty to participate in AOA and Delta Fair’s defense. So we can provide you with a specific proposal, our client needs additional information. Please provide copies of all invoices for the attorney’s fees and costs incurred to defend AOA and Delta Fair. Within fourteen days of receiving those invoices, Chubb will endeavor to make an offer. If attorney-client privilege is a concern, we can attempt a redaction protocol.

Regarding the settlement demand, Chubb disagrees that the actual evidence, which Lloyds will need to prove at trial to a jury, will show that Belle City Amusements, Inc.’s generator caused this accident, regardless of any embellishments in the language of the settlement agreement. Unless your client is keen on proceeding with litigation, our client is amenable to attempting to reach a resolution at a voluntary mediation. For that process to be meaningful, we propose exchanging “open” mediation briefs addressing all the arguments that our clients intend to raise as defenses in litigation, whether they are facts or legal issues, for example priority of coverage, or failure to allocate.

Last, as part of this process, we would appreciate a copy of the AOA and Delta Fair contract. We would also appreciate a copy of the contract with Prime Time Amusements, LLC (“Prime Time”). And last, if you have it, we would like to see Prime Time’s policy. We believe there is a chance AOA and Delta Fair are entitled to coverage under that policy, which would of course help our collective efforts.

Gregory Mast
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We look forward to your response.

Very truly yours,

A handwritten signature in blue ink, appearing to be 'Sina Bahadoran', with a large, sweeping loop at the end.

Sina Bahadoran
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Junaid N. Savani
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